

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
Harrisburg Division**

Christopher David Bailey,

Debtor.

Case No. 24-01674
Chapter 13

Motion to Extend the Automatic Stay

Debtor, through his attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on July 8, 2024. He has filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).
2. The Debtor was involved in one active bankruptcy between July 9, 2023, and July 8, 2024:

Case No.	District	Filed	Dismissed	Reason
23-01031	PAMB	05/08/2023	02/29/2024	Plan Unconfirmable

3. Because the Debtor was involved in only one active bankruptcy between July 9, 2023, and July 8, 2024, the automatic stay is set to expire on August 7, 2024. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

5. This case was filed in good faith. The debtor's monthly income has increased by 44% since the dismissal of the prior case.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receives a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: July 9, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: 

Michael Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com